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Via ECF

June 7, 2024

Hon. Alvin K. Hellerstein, USDJ
US Courthouse, SDNY
500 Pearl St.
New York, NY 10007-1312

*Time for plaintiff is enlarged
to July 3, 2024. Time to
Reply is enlarged to July 15, 2024.
6-13-24
Alvin K. Hellerstein*

Re: Weisner et al. v. Google LLC, Case No.: 20-cv-02862-AKH; Weisner v. Google LLC, et al. 23 Civ. 8186 (AKH)

Dear Judge Hellerstein:

I represent Plaintiff Weisner in the above matters.

On consent of Defendant Google, I write to request a 49 day extension, through and including August 1, 2024 to file Plaintiff's Opposition to Google's Motion for Summary Judgment filed May 30, 2024 in 20-cv-02862 (ECF #s 198-202 – "Google's Motion"). Plaintiff's Opposition is presently due on June 13, 2024.

Plaintiff consents to a reciprocal 49 day period extension for Google's Reply, which would be due September 26, 2024.

I am a sole practitioner, and due to the demands of other matters, including litigated matters, and due to the intervention of the upcoming Jewish Holiday of Shavuuous (Festival of Weeks), with the exercise of reasonable diligence I have been unable to prepare Plaintiff's Opposition to Defendant Google's Motion and am therefore requesting, on consent, a 49 day extension of time to do so. Plaintiff's extension of time request to file Plaintiff's Opposition to Google's Motion is also made because of the need for Aaron Davis, Esq., who has filed a pro hac vice application to appear in Plaintiffs' cases, to be admitted pro hac vice in the SDNY, and to familiarize himself with the Plaintiffs' cases.

Therefore, on behalf of Plaintiff, I respectfully request on consent of Defendant Google, a 49 day extension of time through and including August 1, 2024 to file Plaintiff's Opposition to Google's Motion in 20-cv-02862; and on consent with a reciprocal extension of time for Google's Reply to September 26, 2024.

Respectfully submitted,
/s/ Jacob Ginsburg
Jacob Ginsburg, Esq.

cc:
Counsel for Defendant Google via ECF
Counsel for Involuntary Party Nemanov via ECF